

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:22-CR-324-1BO-RN
NO. 5:22-CR-324-2BO-RN
NO. 5:22-CR-324-3BO-RN

UNITED STATES OF AMERICA

v.

JUAN CARLOS AGUILAR a/k/a
Marcos Manuel Melendez
JUAN JOSE FIGUEROA JIMENEZ
BRAYAN ANTONI PERDOMO

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning on a date unknown to the Grand Jury, but no later than in or about May 21, 2022, and continuing up to and including on or about June 2, 2022, in the Eastern District of North Carolina, and elsewhere, the defendants, JUAN CARLOS AGUILAR, also known as Marcos Manuel Melendez, JUAN JOSE FIGUEROA JIMENEZ and BRAYAN ANTONI PERDOMO, did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding with other persons, known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute five hundred (500) grams or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Controlled Substances Involved in the Conspiracy

With respect to JUAN CARLOS AGUILAR, also known as Marcos Manuel Melendez, the amounts involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him, are fifty (50) grams or more of methamphetamine and five (500 hundred grams or more of cocaine, both Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to JUAN JOSE FIGUEROA JIMENEZ and BRAYAN ANTONI PERDOMO, the amounts involved in the conspiracy attributable to them as a result of their own conduct and the conduct of other conspirators reasonably foreseeable to them, are five hundred (500) grams or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about April 4, 2022, in the Eastern District of North Carolina, the defendant, JUAN CARLOS AGUILAR, also known as Marcos Manuel Melendez, did knowingly and intentionally distribute fifty (50) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

On or about May 12, 2022, in the Eastern District of North Carolina, the defendant, JUAN CARLOS AGUILAR, also known as Marcos Manuel Melendez, did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule

II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

On or about June 2, 2022, in the Eastern District of North Carolina, the defendants, JUAN CARLOS AGUILAR, also known as Marcos Manuel Melendez, JUAN JOSE FIGUEROA JIMENEZ and BRAYAN ANTONI PERDOMO, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute five hundred (500) grams or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any felony violation of the Controlled Substances Act charged herein, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offense.

Upon conviction of any violation of the Gun Control Act, the National Firearms Act, or any other offense charged herein that involved or was perpetrated in whole or in part by the use of firearms or ammunition, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and/or 26 U.S.C. § 5872, as made applicable by 28 U.S.C. § 2461(c), any and all firearms and ammunition that were involved in or used in a knowing or willful commission of the offense, or that were intended to be used in any offense identified in 18 U.S.C. § 924(d)(3), or, pursuant to 18 U.S.C. § 3665, that were found in the possession or under the immediate control of the defendant at the time of arrest.

The forfeitable property includes, but is not limited to, the following:

Personal Property:

- a) One Weihrauch Windicator .357 Magnum/.38 special pistol, serial number 1735571, seized on June 2, 2022, from JUAN CARLOS AGUILAR a/k/a MARCOS MANUEL MELENDEZ at Garner, North Carolina and any and

all associated ammunition

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE: 7 Dec 2022

MICHAEL F. EASLEY, JR.
United States Attorney

BY:


KELLY L. SANDLING

Assistant United States Attorney
Criminal Division